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16 Executive Realty Services, Inc.
and Donald Edward Klein

17 **UNITED STATES DISTRICT COURT**
18 **DISTRICT OF NEVADA**

19 LISA CORSON,
20 v.
21 EXECUTIVE REALTY SERVICES, INC.
and DONALD EDWARD KLEIN,
22 Defendants.

23 Case No. 2:22-cv-01292-RFB-BNW
24 **PARTIES' STIPULATION TO EXTEND**
25 **DEADLINE FOR PLAINTIFF TO FILE A**
26 **MOTION TO STRIKE DEFENDANTS'**
27 **AFFIRMATIVE DEFENSES OR**
DEFENDANTS TO FILE AN AMENDED
ANSWER

(First Request)

1 **PARTIES' STIPULATION TO EXTEND DEADLINE FOR PLAINTIFF TO FILE A**
2 **MOTION TO STRIKE DEFENDANTS' AFFIRMATIVE DEFENSES OR DEFENDANTS**
3 **TO FILE AN AMENDED ANSWER**

4 Pursuant to LR IA 6-2 and LR 7-1, Plaintiff Lisa Corson ("Corson") and Defendants
5 Executive Realty Services, Inc. and Donald Edward Klein (collectively "Defendants"), by and
6 through their undersigned counsel, hereby stipulate and agree to extend the date by which Plaintiff
7 may file a motion to strike affirmative defenses or Defendants to Amend their Answer from
8 December 23, 2022 to January 23, 2023. This is the first such request for an extension of time. In
9 support thereof, the Parties state as follows:

10 1. Corson filed her Complaint on August 11, 2022 at ECF No. 1;
11 2. Defendants filed their Answer on December 2, 2022 at ECF No. 15;
12 3. Plaintiff's motion to strike affirmative defenses deadline is December 23, 2022 (*see*
13 *Fed. R. Civ. P. 12(f)(2)*);

14 4. Defendants' deadline to Amend its Answer is December 23, 2022 (*see Fed. R. Civ.*
15 *P. 15(a)(1)(A)*);

16 5. Plaintiff sent a letter to Defendants' requesting a meet and confer to discuss the
17 affirmative defenses;

18 6. Defendants' Answer to Corson's Complaint contains 23 Affirmative Defenses;

19 7. Counsel for the parties require additional time in which to confer regarding
20 Defendants' Affirmative Defenses as the Parties look towards early resolution of this matter;

21 8. Because of the Holidays, Counsel for both Parties will be unable to meet and confer
22 regarding Affirmative Defenses until December 27, 2022;

23 9. Parties are actively making progress towards early settlement and resolution of this
24 matter;

25 10. The Parties believe that extending Plaintiff's time to file its motion to strike
26 affirmative defenses will conserve resources;

27 11. Parties request an additional 30 days in which to file a motion to strike affirmative
 defenses or amended answer, if needed, up to and including January 23, 2023;

1 12. Defendants' counsel does not object to continuing the deadlines;
2 13. This request is not made for delay; and
3 14. This will not delay or have any effect on the schedule in this case.

4 Accordingly,

5 IT IS STIPULATED that Plaintiff's deadline to file a motion to strike affirmative defenses
6 and for Defendant to Amend their Answer is hereby continued from December 23, 2022 to January
7 23, 2023.

8 DATED: December 16, 2022

9 Respectfully submitted,

10 /s/ Trey A. Rothell

11 MARC J. RANDAZZA
12 TREY A. ROTHELL
13 **RANDAZZA LEGAL GROUP, PLLC**

14 Attorneys for Plaintiff Lisa Corson

15 /s/ Taylor Simpson

16 TAYLOR SIMPSON
17 STERLING KERR
18 **KERR SIMPSON ATTORNEYS AT
19 LAW**

20 Attorneys for Defendants Executive Realty
21 Services, Inc. and Donald Edward Klein

22 IT IS SO ORDERED:

23 
24 _____
25 UNITED STATES MAGISTRATE JUDGE

26 DATED: December 19, 2022